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*Attorneys for Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the lead case,  
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**STIPULATION BETWEEN DEBTORS  
AND OFFICE OF THE UNITED STATES  
TRUSTEE EXTENDING TIME TO  
RESPOND TO BAR DATE MOTION**  
Re: Dkt. No. 1784

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is  
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and  
3 debtors in possession (collectively, the “**Debtors**”), on the one hand, and the Office of the United  
4 States Trustee (the “**U.S. Trustee**”), on the other hand. The Debtors and the U.S. Trustee are  
5 referred to in this Stipulation and Agreement for Order collectively as the “**Parties**,” and each as  
6 a “**Party**.” The Parties hereby stipulate and agree as follows:

7 **RECITALS**

8 A. On May 1, 2019, the Debtors filed the *Motion of Debtors Pursuant to 11 U.S.C.*  
9 *§§ 502(b)(9) and 105(a), Fed. R. Bankr. P. 2002, 3003(c)(3), 5005, and 9007, and L.B.R. 3003-1*  
10 *for Order (I) Establishing Deadline for Filing Proofs of Claim, (II) Establishing the Form and*  
11 *Manner of Notice Thereof, and (III) Approving Procedures for Providing Notice of Bar Date and*  
12 *Other Information to All Creditors and Potential Creditors* [Dkt. No. 1784] (the “**Bar Date**  
13 **Motion**”), which is set for a hearing before the Court at 9:30 a.m. on June 11, 2019. Any  
14 response or opposition to the Bar Date Motion is due by 4:00 p.m. (Pacific Time) on May 28,  
15 2019.

16 B. Counsel for the U.S. Trustee has requested, and counsel for the Debtors has  
17 agreed, that the time for the U.S. Trustee to respond to the Bar Date Motion be extended.

18 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**  
19 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**  
20 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**  
21 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**  
22 **THAT:**

23 1. The time for the U.S. Trustee to file and serve any response or opposition to the  
24 Bar Date Motion is extended through 4:00 p.m. (Pacific Time) on May 31, 2019.

25 *[Signatures on next page]*  
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1 Dated: May 28, 2019

2 KELLER & BENVENUTTI LLP

3  
4 /s/ Jane Kim

5 Jane Kim

6 *Attorneys for Debtors  
and Debtors in Possession*

Dated: May 28, 2019

OFFICE OF THE UNITED STATES  
TRUSTEE

/s/ Marta E. Villacorta

Marta E. Villacorta

Trial Attorney  
*Attorney for Andrew R. Vara,  
Acting United States Trustee for Region 3<sup>1</sup>*

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27 <sup>1</sup> Andrew R. Vara, Acting United States Trustee for Region 3, is acting in this appointment for Tracy Hope Davis,  
28 United States Trustee for Region 17, who is recused from the above-captioned cases.